From: PETERSON Jenn L
To: Eric Blischke/R10/USEPA/US@EPA
Cc: ANDERSON Jim M
Subject: PRG Comments
Date: 07/23/2008 04:34 PM

Eric,

Thanks for sending the table. I think this is a good tool. The one comment I had was to add "Total Dioxin TEQ" to your table. Let me know if what you have written below is consistent with what I have here. I did not go through chemical by chemical because I would have to re-evaluate screening to concur with the inclusion or omission of certain chemicals for the development of PRGs for each receptor type (as the LWG table shows). I didn't have time to do that today.

Receptor / Risk Pathway - Intermediate Step if present (Methodology) - PRG

Wildlife Bird and Mammal Dietary - Acceptable Tissue Residue in Fish (BSAF or FWM) - Sediment PRG
Wildlife Bird Dietary - Acceptable Direct Sediment Exposure (most Sandpiper related) (Direct contact) - Sediment PRG
Wildlife Bird Egg CTL - Acceptable Tissue Residue in Fish (BMF) - Sediment PRG

Fish Dietary (PAHs and metals only) - Acceptable Tissue Residue Invertebrates (BSAF or BAF) - Sediment PRG
*The LWG may be proposing to do this for more than just bioaccumulatives, which isn't consistent with the problem formulation. PCB congeners should be under CTL, not dietary. We should decide where to put butyl tins, as we didn't have fish data until Round 3 for evaluation. The LWG has it as a dietary, and I am thinking it may have to be considered a bioaccumulative and assessed by the tissue residue (CTL), esp. given what I saw in Round 3 tissue.

Fish Critical Tissue Level (CTL) (all bioaccumulatives) (BSAF or FWM)- Sediment PRG
Fish Toxicity (Direct Contact) - Water PRG

Invertebrate CTL (BSAF)- Sediment PRG
Invertebrate Toxicity (Direct Contact) - Sediment PRG
Invertebrate Toxicity (Direct Contact) - Water PRG

Plant Toxicity (Direct Contact) - Sediment PRG

The sediment PRGs will need to be applied to the appropriate scale of the receptor.

I also had a comment on the LWG write -up from the meetings. I know this is all in process, but I think we have to be careful about going to an average Kow in the food web model as an "alternative" to using congeners for the evaluation of TEQ risk. The model (esp. the LWG model as is) is very sensitive to Kow, and we would have to make sure that the selected Kow matched with the range of congeners we are interested - esp. related to the TEQ. However, based on recent conversations with Mike and Dana I am sure you are aware of this. I agree with where the HH group is going in regard to congener based PRGs where applicable.

-Jennifer

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Tuesday, July 22, 2008 3:43 PM
To: PETERSON Jenn L
Subject: PRG Table

(See attached file: PRGMethods062508.xls)